

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

JASON R. BECK

Debtor

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MIDFIRST BANK

Movant

v.

JASON R. BECK; . Linda Beck, Non-  
Debtor, Co-Mortgagor, and CHARLES J.  
DEHART,III, ESQUIRE, CHAPTER 13  
TRUSTEE

Respondents

Case No. 5-19-04441

Chapter 13

Robert N. Opel, II, B.J.

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**DEBTOR'S REPLY TO MOTION FOR RELIEF OF MIDFIRST BANK**

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AND NOW, comes the Debtor herein by and through his attorney, Brian E. Manning Esquire, and files the following Reply to the Motion for Relief and in support thereof alleges:

1. Admitted.

2. Admitted. By way of further answer, this response is being filed only on behalf of Jason R. Beck and not on behalf of the co-mortgagor, Lind Beck.

3. Admitted.

4. Admitted.

5. Admitted.
6. Admitted in part.
7. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial<sup>1</sup>.
8. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.
9. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.
10. No response required. To the extent as response is required, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court enter an order denying the Motion for Relief without prejudice and granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted  
**Law Offices of Brian E. Manning**  
/s/ Brian E. Manning  
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Attorney for the Debtor

Dated: February 21, 2020

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<sup>1</sup> Debtor would be willing to enter into a Stipulation with the Movant.